

August 29, 2019

Ms. Amy Zimpfer
Associate Director, Air Division
Region 9
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Dear Ms. Zimpfer:

The California Air Resources Board (CARB) is providing to the U.S. Environmental Protection Agency (U.S. EPA) technical clarifications related to elements of the Ventura County Air Pollution Control District's (District) *2016 State Implementation Plan for the 2008 8-Hour Ozone Standard* (2016 Ozone SIP). Specifically, these clarifications address the Clean Air Act (Act) requirements for reasonable further progress (RFP) and transportation conformity. These clarifications will allow U.S. EPA to approve the 2016 Ozone SIP.

The 2016 Ozone SIP included an emissions inventory, RFP demonstration, and transportation conformity emissions budgets among other required elements. In response to court decisions, the 2016 Ozone SIP, along with plans for nine other areas, was amended by the *2018 Updates to the California SIP* (2018 SIP Update). For Ventura County, the 2018 SIP Update included an updated RFP demonstration and RFP baseline emission inventory, both which superseded and replaced those submitted with the 2016 Ozone SIP.

Further, U.S. EPA requested additional information related to the transportation conformity budgets. Attachment A to this letter demonstrates that the transportation conformity emissions budgets in the 2016 Ozone SIP remain consistent with the 2018 SIP Update RFP demonstration. Attachment B to this letter includes a sensitivity analysis that demonstrates the Ventura County transportation conformity rounding margins can be accommodated in the attainment demonstration.


The transportation conformity emissions budgets included in the 2016 Ozone SIP were calculated using the CARB on-road motor vehicle emissions model, EMFAC2014. Since U.S. EPA approved EMFAC2017 on August 15, 2019, the transportation conformity emissions budgets will be outdated and will need to be revised using EMFAC2017 prior to the expiration of the grace period established by U.S. EPA. CARB will submit updated budgets to U.S. EPA by the first quarter of 2021. To address this interim period, CARB requests that U.S. EPA limit its approval of the Ventura County transportation conformity emissions budgets submitted in the 2016 Ozone SIP to last only until the effective date of future U.S. EPA adequacy findings for future replacement budgets. (See 40 CFR 93.118(e)(1)).

Without the ability to replace the applicable emission budgets with submitted budgets found adequate using the budget adequacy process, the benefits of using the updated data may not be realized for a year or more after the SIPs are submitted, due to the SIP approval process. We appreciate U.S. EPA's willingness to work with CARB staff in our efforts to utilize motor vehicle emission budgets based on the most up-to-date, accurate data as soon as possible upon availability.

By ensuring that the transportation conformity emissions budgets are based on the most up-to-date, accurate data as soon as it is available, CARB can update the budgets for a given region once the EMFAC2017 model is approved by U.S. EPA. The updated budgets may demonstrate that any increase in emissions in the inventory can be offset by reductions in emissions from other sources such as stationary or area-wide sources, and thus the transportation conformity emissions budgets remain consistent with the attainment demonstration.

If you have any questions, please contact Ms. Sylvia Vanderspek, Branch Chief, Air Quality Planning Branch, at (916) 324-7163.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul [unclear] for MTB". The signature is written in a cursive, flowing style.

Dr. Michael T. Benjamin, Chief
Air Quality Planning and Science Division

Enclosures

cc: See next page.

Ms. Amy Zimpfer
August 29, 2019
Page 3

cc: Mr. Michael Villegas
Air Pollution Control Officer
Ventura County Air Pollution Control District
669 County Square Drive
Second Floor
Ventura, CA 93003

Ms. Sylvia Vanderspek
Branch Chief
Air Quality Planning Branch
California Air Resources Board

Ms. Amy Zimpfer
August 29, 2019
Page 4

bcc: (External, with Enclosures, via email)

Anita Lee
U.S. Environmental Protection Agency, Region 9
(Lee.Anita@epa.gov)

Jefferson Wehling U.S. Environmental Protection Agency
(Wheling.Jefferson@epa.gov)

John Kelly
U.S. Environmental Protection Agency, Region 9
(Kelly.John@epa.gov)

Wienke Tax
U.S. Environmental Protection Agency, Region 9
(Tax.Wienke@epa.gov)

Karina O'Connor
U.S. Environmental Protection Agency, Region 9
(Oconnor.Karina@epa.gov)

Ali Ghasemi
Ventura County Air Pollution Control District
(aghasemi@vcapcd.org)

Rongsheng Luo
Southern California Association of Governments
(luo@scag.ca.gov)

Ms. Amy Zimpfer
August 29, 2019
Page 5

bcc: (Internal, with Enclosures, via email)

Craig Segall, LO
Daniel Whitney, LO
Pippin Brehler, LO
Dave Edwards, AQPSD
Nicole Dolney, AQPSD
Carol Sutkus, AQPSD
Nesamani Kalandiyur, AQPSD
Ariel Fideldy, AQPSD
Austin Hicks, AQPSD
Shannon Hatcher, AQPSD

(Hard copies)

AQPSD Chron (w/ Enclosures)
SIP Library (w/ Enclosures)

Assignment # 10641

X:\2016 Ozone SIPs\Ventura SIP\Additional EPA Submissions\CARB clarification letter to U.S. EPA for Ventura 2016 Ozone Plan.docx

X:\2016 Ozone SIPs\Ventura SIP\Additional EPA Submissions\Clarification letter - Attachment A

X:\2016 Ozone SIPs\Ventura SIP\Additional EPA Submissions\Clarification letter - Attachment B